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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

THE CITY OF PORTLAND,

Defendant.

Civil Case No. 3:12-CV-02265-SI

**DECLARATION OF ANIL S. KARIA
IN SUPPORT OF INTERVENER-
DEFENDANT PORTLAND POLICE
ASSOCIATION'S MEMORANDUM IN
SUPPORT OF ENTRY OF PROPOSED
SETTLEMENT AGREEMENT**

I, ANIL S. KARIA, declare that:

1. I am an attorney representing Intervener-Defendant Portland Police Association ("PPA") in this case. I make this declaration in support of Intervener-Defendant Portland Police Association's Memorandum in Support of Entry of Proposed Settlement Agreement.
2. The PPA is a labor organization that represents a collective bargaining unit of police officers, sergeants, criminalists, and detectives employed by the City.

3. The PPA and Defendant City of Portland are parties to a collective bargaining agreement effective July 1, 2013 through June 30, 2017. A true and correct copy of the collective bargaining agreement is attached hereto as Exhibit A.

4. After approximately 10 months of challenging and rigorous mediation and collective bargaining negotiations, the PPA, the City, and Plaintiff United States (“United States”) resolved the PPA’s objections to the Settlement Agreement. The parties memorialized their resolution in a Memorandum of Agreement (Docket No. 54-1). The PPA, the City, and the United States had their respective constituents, such as the City Council and the PPA’s Executive Board, approve the Memorandum of Agreement.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 11th day of March, 2014, in Portland, Oregon.

/s/ Anil S. Karia
ANIL S. KARIA

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing DECLARATION OF ANIL S. KARIA IN SUPPORT OF INTERVENER-DEFENDANT PORTLAND POLICE ASSOCIATION'S MEMORANDUM IN SUPPORT OF ENTRY OF PROPOSED SETTLEMENT AGREEMENT on:

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by service electronically pursuant to LR 100.7.

DATED this 11th day of March, 2014.

TEDESCO LAW GROUP

By: /s/ Anil S. Karia
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Portland Police Association